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January 31, 2001

Docket Management System,  
U.S. DOT  
Room Plaza 401  
400 Seventh Street SW  
Washington, DC 20590-0001

**Electronic Filing via DMS**

Re: *"Airworthiness Directives," Docket No. FAA-2000-8460, 66 Fed. Reg. 3381 (January 12, 2001): Request for Extension of Comment Period*

Dear Madam Administrator:

On January 12, 2001, FAA published in the *Federal Register* a Notice of Proposed Rulemaking (NPRM) titled "Airworthiness Directives; Proposed Rules," Docket No. FAA-2000-8460. *66 Fed. Reg. 3381 (January 12, 2001)*. In the NPRM, FAA proposes to revise 14 CFR part 39 by adding provisions currently found in many airworthiness directives (ADs) to part 39 and omitting this language from most individual airworthiness directives. In addition, FAA is proposing to render revised part 39 in "plain language" format.

The comment period associated with the NPRM is scheduled to close on **February 12, 2001**.

Helicopter Association International (HAI) plans to submit comments endorsing the FAA's proposal to remove boilerplate provisions from individual ADs, placing these in part 39 instead. HAI also plans to ask FAA to place a note on each individual AD directing readers to the relevant provisions of part 39. HAI is the professional trade association for the civil helicopter industry. Its 1,500-plus member organizations and 1,400-plus individual members safely operate more than 5,000 helicopters approximately 2 million hours each year. HAI is dedicated to the promotion of the helicopter as a safe, effective method of commerce and to the advancement of the civil helicopter industry.

HAI recently became aware that the revision of current part 39 into "plain language" format inadvertently may have introduced substantive changes to some provisions. To permit HAI and its members to document these perceived changes and provide a thorough comment to FAA, HAI respectfully asks FAA to extend the comment period an additional 30 days, to **March 14, 2001**.

Sincerely,

**Original signed by Joe Corrao**

Joseph Corrao

*Dedicated to the advancement of the civil helicopter industry*

Vice President, Regulations & International Affairs